



Cell-Loc Inc.

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September 20, 1999

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Attention:

Magalie Roman Salas,
Secretary of the Federal Communications Commission
445 - 12 Street Lobby
Washington, DC
20554

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Enclosed:

1 original document (11 pages) entitled: "The E911 Phase II Mandate"
presented by Dr. Michel Fattouche, President & CEO of Cell-Loc Inc.
Sept. 1999 + 1 copy (11 pages)

Dear Sir or Madam:

Please find enclosed the presentation, which was presented to the Commissioners on September 7th and 8th, 1999 with regards to Docket No. 94-102 Enhanced 911 Emergency Calling System.

I am pleased to submit, ex parte, this presentation with the interest of informing all interested and involved parties that wireless location for E911 is possible for analog and digital within the set FCC standards of 125 m, RMS.

Respectfully submitted,

Dr. Michel Fattouche,
President & CEO
Cell-Loc Inc.

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The E911 Phase II Mandate

Dr. Michel Fattouche

President, CEO

Cell-Loc Inc.

Sept. 1999

Objective

Preserve the E911 mandate as it stands.

Why was the Mandate Created?

To improve public safety by automatically providing PSAPs with the location of ***all*** wireless 911 callers in a timely manner.

Additional Benefits of the Mandate

- Creation of a new hi-tech industry
 - new technologies have been created
 - new businesses have offered new jobs
 - new services have been enabled
- US has become a world leader in this area.

Why Would the FCC Change or Delay the Mandate?

- **Technological Issues**
 - The FCC may believe compliant technology does not exist.
 - Uncertainty regarding pending future technologies.
 - Cost Efficiency.
- **Economic Issues**
 - Cost recovery is insufficient to offset deployment costs.

Response to the Technological Issues

- Network-Based Wireless Location technology exists today for AMPS, CDMA and TDMA.
- It complies with the E911 Mandate of 125m RMS.
- It works indoors and outdoors.
- It can offer accuracy as good as **10** to **15m**.
- It works for legacy phones.
- It is an emerging technology which will improve with time.

Pending Future Technologies: GPS in the Handset

- Does not exist today.
- Does not comply with the mandate.
 - Not all calls can be located by GPS
 - will not meet 125 m RMS accuracy
- Cannot locate legacy phones.
- GPS can always compete after **2001** if it becomes available.
- GPS is already a mature technology.

Cost Efficiency

- On average, any particular subscriber makes one wireless 911 call every 3 years.
 - replacing a handset is expensive for one call every 3 years
- On average, a cellular base station receives 2 wireless 911 calls per day.
 - more efficient to install one box in a cell site than replace 1400 phones
 - critical to implement a cost-effective solution

Response to the Economic Issues

- Cell-Loc's technology is a Software Radio.
- Cell-Loc's technology can be automatically reconfigured to locate wireless 911 calls on all standards (can be used for services other than E911).
- Cell-Loc will offer to carriers the location of all wireless 911 calls *free of charge*.

The Cellocate Service Bureau

- Cell-Loc shall, at its own cost, build, install and maintain the necessary Cellocate™ System infrastructure equipment to support a nation-wide wireless location service bureau.
- This service bureau shall provide wireless location services to all subscribers. All wireless standards, regardless of the carrier, shall be supported.
- In exchange for this non-exclusive access, the service bureau shall deliver to all wireless carriers unrestricted and free access to E911 location data fully compliant with the FCC mandate.

There is No Reason to Delay the Mandate

- Compliant technology exists.
- The mandate will be met whether GPS in the handset is available or not.
- No location infrastructure costs to the carriers (Carriers have already elected to follow the Service Bureau model).
- Public Safety is improved.